



Order Filed on January 3, 2018
by Clerk, U.S. Bankruptcy
Court - District of New Jersey

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PHELAN HALLINAN DIAMOND & JONES, PC
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Mt. Laurel, NJ 08054
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Attorneys for Secured Creditor: PARAMOUNT
RESIDENTIAL MORTGAGE GROUP, INC.
UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

CHRISTOPHER A. DAWES

Case No: 17-29111 - SLM

Hearing Date: 12/13/2017

Judge: Stacey L. Meisel

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION

The consent order set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**.

DATED: January 3, 2018


Honorable Stacey L. Meisel
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:

CHRISTOPHER A. DAWES

CASE NO. 17-29111 - SLM

Debtor

CHAPTER 13

CONSENT ORDER RESOLVING
OBJECTION TO CONFIRMATION

HEARING DATE: 12/13/2017

This Consent Order pertains to the property located at 1414-16 FRANCES LANE,
PLAINFIELD, NJ 07062-2125, mortgage account ending with "5388";

THIS MATTER having been brought before the Court by Michelle Labayen, Esquire attorney for debtor, CHRISTOPHER A. DAWES upon the filing of a Chapter 13 Plan, PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. by and through its attorneys, Phelan Hallinan Diamond & Jones, PC having filed an Objection to the Confirmation of said Chapter 13 Plan and the parties having subsequently resolved their differences; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for other and good cause shown:

1. The secured creditor, PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC., shall be permitted to file a secured Proof of Claim after Confirmation. The arrears reflected in said to-be-filed secured Proof of Claim will be approximately **\$127,087.76**.
2. The Trustee is authorized not to pay the secured arrearage claim (Proof of Claim to be filed shortly) of PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.. for the purpose of allowing the Debtor to apply and potentially complete a loan modification. Should the Debtor qualify for a loan modification, the loan modification must be approved no later than **March 18, 2018 or as extended by the Court**.
3. If Loan Modification is approved, PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. shall file an Amended Proof of Claim showing the amount of arrears paid to date by the Trustee.
4. If a loan modification is not approved by **March 18, 2018 or as extended by the Court**, the debtor shall do one of the following: 1) file a Modified Plan to cure the arrearage claim of Movant; or 2) file a Modified Plan to surrender the property subject to said claim; or 3) a Notice to Convert to Chapter 7; or 4) a Notice to Dismiss Case.
5. Debtor acknowledges that the monthly post-petition mortgage payment amount is subject to change in accordance with the terms of the note and mortgage.

6. Debtor shall tender adequate protection payments to PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. as required by the Loss Mitigation Program (LMP). The adequate protection payments will continue only while the Debtor is in LMP. The Loss Mitigation Program is scheduled to terminate on March 18, 2018. If the Debtor fails to make adequate protection payments, PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. will file an Application for Early Termination of LMP. Once the Loss Mitigation Program terminates on March 18, 2018, or an earlier date confirmed by the court, the Debtor shall cease tendering the reduced adequate protection payments and begin making regular monthly mortgage payments to PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. as required by the mortgage and note.

7. This Consent Order shall be incorporated in and become a part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,
Content and entry of the within Order:

PHELAN HALLINAN DIAMOND & JONES, PC
Attorneys for Secured Creditor:
PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.

/s/ Nicholas V. Rogers
Nicholas V. Rogers, Esq.
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
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Tel: 856-813-5500 Ext. 42689
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Email: nicholas.rogers@phelanhallinan.com

Dated: 01/02/2018

/s/Michelle Labayen
Michelle Labayen, Esquire
Attorney for debtor

Dated: 01/02/2018

Certificate of Notice Page 4 of 4
United States Bankruptcy Court
District of New Jersey

In re:
Christopher A. Dawes
Debtor

Case No. 17-29111-SLM
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-2

User: admin
Form ID: pdf903

Page 1 of 1
Total Noticed: 1

Date Rcvd: Jan 04, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 06, 2018.

db +Christopher A. Dawes, 1414 Frances Lane, Plainfield, NJ 07062-2125

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 06, 2018

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 4, 2018 at the address(es) listed below:

Denise E. Carlon on behalf of Creditor Toyota Motor Credit Corporation
dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Marie-Ann Greenberg magecf@magtrustee.com
Michelle Labayen on behalf of Debtor Christopher A. Dawes njchapter7@gmail.com,
benitezgiovanna@gmail.com
Nicholas V. Rogers on behalf of Creditor PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.
nj.bkecf@fedphe.com
Rebecca Ann Solarz on behalf of Creditor Toyota Motor Credit Corporation
rsolarz@kmlawgroup.com
Sherri J. Braunstein on behalf of Creditor PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.
nj.bkecf@fedphe.com, nj.bkecf@fedphe.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 7